

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

NATALIE ALTINER,

Plaintiff,

V.

**FEDEX GROUND PACKAGES
SYSTEMS, INC.,**

Defendant.

1:08-cv-00034-WHA-CSC

MOTION FOR ADMISSION PRO HAC VICE FOR JOSEPH P. MILCOFF

Comes now, Kenneth D. Sansom—one of the attorneys for defendant FedEx Ground Package System, Inc. (“FedEx Ground,” which was incorrectly named as the defendant in the above-captioned matter as FedEx Ground Packages Systems, Inc.) and a member in good standing of the Alabama State Bar and the Bar of the United States District Court for the Middle District of Alabama—and respectfully requests the entry of an order admitting Joseph P. Milcoff pro hac vice pursuant to Local Rule 83.1(b). In support of this motion, movant shows this Court the following:

1. Since October 21, 1999, Joseph P. Milcoff has been a member in good standing of the Bar of the Supreme Court of Pennsylvania, where he regularly practices law. A certificate of good standing is attached hereto as Exhibit A.
2. Joseph P. Milcoff, a Senior Attorney at FedEx Ground, is appearing as co-counsel for FedEx Ground.
3. Joseph P. Milcoff has been admitted to practice before the following courts:

Supreme Court of Pennsylvania
U.S. District Court, Middle District of Pennsylvania
U.S. Court of Appeals, Third Circuit
U.S. District Court, Western District of Pennsylvania
U.S. District Court, District of Colorado
U.S. District Court, Northern District of Ohio
U.S. Court of Appeals, Fifth Circuit

4. Joseph P. Milcoff is particularly qualified to handle the above-referenced action before this Court in association with local counsel of record Robert K. Spotswood and Kenneth D. Sansom of the law firm Spotswood, Sansom & Sansbury, LLC.

5. The required \$50 pro hac vice admission fee has been concurrently forwarded to the Court by overnight delivery.

WHEREFORE, PREMISES CONSIDERED, movant respectfully requests that this Court grant Joseph P. Milcoff, a non-resident attorney, admission to practice in this particular case.

DATED this 1st day of August, 2008.



Kenneth D. Sansom (SAN 047)

One of the Attorneys for the Defendant
Robert K. Spotswood (SPO 001)
Kenneth D. Sansom (SAN 047)
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Of Counsel to the Defendant


CERTIFICATE OF SERVICE

The undersigned declares as follows:

I hereby certify that on this date I served the foregoing on the following persons
by electronic mail:

Jon C. Goldfarb
Ethan Detling
Wiggins Childs Quinn & Pantanzis, PC
301 19th Street North
Birmingham, AL 35203-3204
205-314-0500
Fax: 205-254-1500
Email: jgoldfarb@wcqp.com
Email: edettling@wcqp.com

DATED this 1st day of August 2008, at Birmingham, Alabama.



Of Counsel



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Joseph Page Milcoff, Esq.

DATE OF ADMISSION

October 21, 1999

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 20, 2008

A handwritten signature in cursive script, reading "Patricia A. Nicola".

Patricia A. Nicola
Chief Clerk

AO 136
(Rev 4/93)

CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA)
) ss.
WESTERN DISTRICT OF PENNSYLVANIA)

I, **ROBERT V. BARTH, JR.**, Clerk of the United States District
Court for the Western District of Pennsylvania

DO HEREBY CERTIFY That **JOSEPH PAGE MILCOFF** was duly
admitted to practice in said Court on October 12, 2000, and is in
good standing as a member of the bar of said Court.

Dated at Pittsburgh, Pennsylvania ROBERT V. BARTH, JR.
Clerk

on August 4, 2008

By Jason L. Schantz
Jason L. Schantz Deputy Clerk